



## Claim Form (CPR Part 8)

In the HIGH COURT OF JUSTICE, KING'S BENCH DIVISION, BIRMINGHAM DISTRICT REGISTRY											
Claim no.	KB-2022-BHM-000188										
Fee Account no.	PBA0082797										
Help with Fees - Ref no. (if appli- cable)	<table><tr><td>H</td><td>W</td><td>F</td><td>-</td><td></td><td></td><td>-</td><td></td><td></td><td></td></tr></table>	H	W	F	-			-			
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### Claimant

- (1) WOLVERHAMPTON CITY COUNCIL
- (2) DUDLEY METROPOLITAN BOROUGH COUNCIL
- (3) SANDWELL METROPOLITAN BOROUGH COUNCIL
- (4) WALSALL METROPOLITAN BOROUGH COUNCIL



### Defendant(s)

- (1-4) PERSONS UNKNOWN (AS DESCRIBED IN THE AMENED ATTACHED PARTICULARS OF CLAIM)
- (5) ANTHONY PAUL GALE
- (6) WIKTORIA SZCZUBLINSKA
- (7) ISA IQBAL

Does your claim include any issues under the Human Rights Act 1998? ☐ Yes ☒ No

### Details of claim (see also overleaf)

Pursuant to the Court's powers under section 37(1) Senior Courts Act 1981, to restrain street racing and associated dangerous driving activities in the Black Country Area (which the Claimants define, for the purposes of this injunction application, as the entirety of the combined local government areas of Dudley, Sandwell, Walsall and Wolverhampton Councils).

Should the honourable court be minded to grant the injunctive relief sought by the Claimants, the Claimants further invite the Court to exercise the discretion granted to it pursuant to rule 81.8 of the Civil Procedure Rules and dispense with the requirement to serve any injunction and power of arrest on Persons Unknown personally and instead serve any injunction and power of arrest granted by alternative means.

Full details of the Claim, together with draft orders and further details of the requisite steps the Claimants suggest would achieve effective alternative service of the order should the honourable court be minded to grant any injunction and power of arrest on persons unknown, and should the honourable court further be minded to permit the Claimants to serve any order by alternative means to personal service, are particularised in the attached documentation.

Defendant's  
name and  
address

(1-4) PERSONS UNKNOWN (as described in the Amended Particulars of Claim)  
(5) Mr ANTHONY PAUL GALE (c/o Messrs Waldrons Solicitors)  
(6) Miss WIKTORIA SZCZUBLINSKA (c/o Messrs Charles Strachan Solicitors)  
(7) Mr ISA IQBAL (c/o Messrs Waldrons Solicitors)

£

Court fee	569.00
Legal representative's costs	
Issue date	

**Claim no.**

KB-2022-BHM000188

**Details of claim** (continued)

"BLACK COUNTRY CAR CRUISE"  
Wolverhampton City Council, Civic Centre, St Peter's  
Square, Wolverhampton, WV1 1RG  
DX744350 Wolverhampton 27  
Ref: LIT/AS/LIJ017753P  
E-mail: [litigation@wolverhampton.gov.uk](mailto:litigation@wolverhampton.gov.uk)

Claimant's or claimant's legal representative's  
address to which documents should be sent if  
different from overleaf. If you are prepared to  
accept service by DX, fax or e-mail, please  
add details.

## Statement of Truth

I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

☐ **I believe** that the facts stated in these particulars of claim are true.

☒ **The Claimant believes** that the facts stated in these particulars of claim are true. **I am authorised** by the claimant to sign this statement.

### Signature



☐ Claimant

☐ Litigation friend (where claimant is a child or a Protected Party)

☒ Claimant's legal representative (as defined by CPR 2.3(1))

### Date

Day

13

Month

12

Year

2023

Full name

TRACEY CHRISTIE

Name of claimant's legal representative's firm

WOLVERHAMPTON CITY COUNCIL

If signing on behalf of firm or company give position or office held

HEAD OF LEGAL SERVICES

